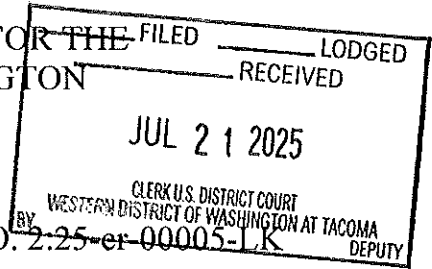


UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE



UNITED STATES OF AMERICA,
Plaintiff

v.

BRANDEN TRAGER and
MAYHEM SERVICES, LLC,
Defendants.

CASE NO. 2:25-cr-00005-LK

SUPERSEDING INFORMATION

18 U.S.C. § 2
16 U.S.C. §§ 3372 and 3373

The Acting Assistant Attorney General charges that:

COUNT 1
Lacey Act Trafficking

DEFENDANTS

1. **BRANDEN TRAGER** was a U.S. citizen residing in Brush Prairie, Washington, and the registered owner and agent of **MAYHEM SERVICES, LLC**.


2. **MAYHEM SERVICES, LLC**, ("**MAYHEM**") was a business incorporated in the State of Washington with its headquarters in Brush Prairie, Washington. **MAYHEM** was in the business of organizing and providing guides for hunting and fishing trips in the Pacific Northwest.

3. **MAYHEM**, acting through its agents and employees, including **TRAGER**, who were acting within the scope of their agency and employment for the intended benefit, at least in part, of **MAYHEM**, did arrange to illegally guide bird-hunting trips in Canada and illegally take and transport migratory birds in Washington.

1 4. Between on or about November 1, 2022, and on or about January 15, 2023,
2 in the Western District of Washington and elsewhere, defendants **TRAGER** and
3 **MAYHEM** did knowingly engage in conduct that involved the sale and purchase of
4 wildlife and did knowingly transport and attempt to transport said wildlife that in the
5 exercise of due care they should have known were taken and possessed in violation of,
6 and in a manner unlawful under, any law, regulation, and treaty of the United States and
7 in violation of foreign law, specifically the Migratory Bird Treaty Act (16 U.S.C. § 703),
8 50 C.F.R. §§ 10, 20, and British Columbia Wildlife Act Hunting Regulation §§ 1(1),
9 12(a)(vi), 14(b), 15(j), 48(1)(a), 51(1)(a)(i).

10 All in violation of Title 16, United States Code, Sections 3372(a)(1),
11 3372(a)(2)(A), 3372(a)(4), and 3373(d)(2), and Title 18, United States Code, Section 2.

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14 ADAM GUSTAFSON
Acting Assistant Attorney General
15 U.S. Department of Justice
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16

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18 RYAN CONNORS
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